

# PSJ3

# Exhibit 464

## Message

**From:** Wiley, Allison [awiley@hdmanet.org]  
**Sent:** 8/18/2011 3:57:41 PM  
**To:** Wiley, Allison [awiley@hdmanet.org]  
**CC:** Ducca, Anita [aducca@hdmanet.org]  
**Subject:** [WARNING : MESSAGE ENCRYPTED] Reminder RAC Call - Today at 2pm  
**Attachments:** 08-18-2011 RAC confcallagenda.doc; DRAFT HDMA Comments to the NLRBtrkchgs.doc; DRAFT HDMA Comments to the NLRB chgsaccptd.doc; DRAFT-CDW-Comments-Ambush-Elections1.pdf; DRAFT HDMA Comments to DEA on Reg Fees081611 v 2 trkchgs.doc; DRAFT HDMA Comments to DEA on Reg Fees081611 v 2 chgsaccptd.doc; Draft HDMA Comments on PDMA Proposal to Remove Pedigree 08-12-11 v 1.doc

**To: Regulatory Affairs Committee Members**  
**Re: Reminder RAC Call - Today at 2pm**

*Please note that this information is for HDMA Distributor members only and not for external circulation.*

This is a friendly reminder about today's RAC conference call at 2:00pm (Eastern). Due to the full agenda, HDMA expects that the RAC conference call will exceed the hour time limit, and RAC participants should anticipate that today's RAC call might last up to an hour and a half. Attached are the agenda and background documents, and below are links to other background materials. As previously noted, the Coalition for Democratic Workplace's (CDW) NLRB comment letter requires you to enter a password, "**cdwcomments**".

On the DEA agenda item, we plan to discuss a suggestion NACDS made today that the trade associations concerned about DEA's proposed fee increase submit a joint comment letter to DEA. HDMA believes it would be worthwhile to discuss this with the other associations. Presuming we can agree on common issues and a joint letter/comments, we think it would be worthwhile, in addition to filing our own letter. NACDS has also asked NCPA, FMI, and GPHA. As a start, common issues could include:

- DEA should renew their efforts at cost savings before increasing fees. The rest of the federal government is experiencing budget cuts or at least is very unlikely to get increases despite having more to do
- While DEA explains how they will spend the additional fees, there is no accountability in terms of what it will accomplish. Yes, they may hire more agents and do more inspections, but what will be the results in terms of reducing abuse and diversion (e.g., how many more meth labs will they shut down or how many additional prosecutions for diversion will there be)?

Chains drug stores and others who store large volumes (e.g., large food distributors with warehouses to service their retail pharmacies) may also object to DEA's characterization of diversion as being a direct result of holding/storing large volumes

The following is the conference call-in information:

#### **Regulatory Affairs Committee Conference Call**

Dial-in Number: 888-206-2266

Guest ID: 2533738

The following are links to background information for Thursday's call:

- [NLRB's Union Elections Proposed Rules](#)
- [OSHA's Reporting Requirements Proposed Rule](#)
- [DEA's Registration Fee Proposed Rule](#)
- [FDA's PDMA Proposed Rule](#)
- [FDA's Notice of Bar Code Guidance - Questions and Answers](#)
- [FDA's Updated Bar Code Guidance - Questions and Answers](#)
- [FDA's Drug Shortage Workshop Notice](#)
- [Premier Healthcare Alliance Analysis](#)
- [Series of Recommendations for Healthcare Providers](#)

- Approved REMS for Certain Fentanyl Products - Actiq and Fentora (pages 79-82) and Lazanda (pages 93-97)
- OMB's Request for Comments on U.S. Government Counterfeit Strategy.

We look forward to today's discussion.

Thanks,

*Allison*

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